

**IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

THE EXCELLENT THE EXCELLENT RAJ
K. PATEL, from all capacities,

Plaintiff No. 1:23-cv-08765-UA

v.

Dated: January 7, 2024

NEAL K. PATEL and SANJANA KUMAR,

Defendants

PLAINTIFF'S REPLY TO ORDER AT DOCKET 15

T.E., T.E. Mr. Raj K. Patel (*pro se*), respectfully submits this response to the order at Dkt.

15. Erickson v. Pardus, 551 U.S. 89, 94 (2007) (all documents filed pro se are liberally construed).

- I. The natures of the claims were both verbal battery and invasion of privacy by sexual slurs. So, filing bar should not issue.
- II. Raj honestly believed that the torts amounted to over \$75,000 on diversity jurisdiction. So, filing bar should not issue.
- III. Raj has complied with all orders and rules as a faithful pro se litigant would. So, filing bar should not issue.
- IV. Raj also has an on-going case in McKoy et al. v. The Trump Corp. et al., No. 1:18-cv-9936 (S.D.N.Y. 202_) and a filing bar could have unintended prejudicial consequences towards all parties.
- V. The federal government also gives United States citizens a federal right of privacy under the 14th Amendment Privileges or Immunities Clause. Young v. Hawaii, 911 F. Supp. 2d 972, 992 (D. Haw. 2012). So, filing bar should not issue because the

claim was on federal question jurisdiction as well. Nordyke v. King, 563 F.3d 439, 446-47 (9th Cir. 2009). Neal is also committing an invasion of privacy by intruding on my emotional solace and by making my burdening my existence by making his wedding venue in Dubai hostile towards me, by inviting persons who have committed social crimes and torts against Raj.

- VI. Raj has been under mental pain and suffering since at least 2017 when he took time off from the University of Notre Dame du Lac Law School in South Bend, Indiana.
- VII. Nevertheless, if the complaint is dismissed, Raj moves for the court to seal the complaint because the public has no interest in knowing any detail of this case.

Therefore, Raj moves to not issue the filing bar because he honestly believed that the matter was ripe under diversity and federal question jurisdictions, and seal the entire docket to protect Raj's privacy interests of this complaint that he submitted while under mental pain and suffering.

Respectfully submitted,

/s/ Raj K. Patel
Rama CCCX
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T.E. Mr. President/Student Body President, Student Gov't Ass'n of
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T.E. Mr. Student Body President, Brownsburg Cmty. Sch. Corp./President, Brownsburg High Sch. Student Gov't 2009-2010 (corp. sovereign 2009-present)

Rep. from the Notre Dame L. Sch. Student B. Ass'n to the Ind. St. B. Ass'n 2017

Deputy Regional Director, Young Democrats of Am.-High Sch. Caucus 2008-2009

Co-Founder & Vice Chair, Ind. High Sch. Democrats 2009-2010

Vice President of Fin. (Indep.), Oxford C. Republicans of Emory U., Inc. 2011-2012

Intern, Marion Cnty. Clerk Elizabeth "Beth" White for Sec'y of St. of the St. of Ind. 2014

**J.D. Candidate, Notre Dame L. Sch. (2015-17)

Volunteer, Barack Obama for America (2008)

Intern, Jill Long Thompson for Governor (2008)

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CERTIFICATE OF SERVICE

I certify that I served a copy of the foregoing Motion to Expedite on 1/7/2024 to below individuals via the Clerk of Court:

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Respectfully submitted,

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